REMARKS/ARGUMENTS

Prior to entry of this amendment, claims 1-12, 14-27, 29-34 and 36-46 were pending in this application. An Amendment filed with an RCE on May 14, 2007 amended claims 1, 22 and 33 but did not add or cancel any claims. A Notice of Non-Responsive Amendment (the "Notice") was mailed on July 18, 2007. This supplemental amendment is filed further to the May 14, 2007 Amendment and in response to the Notice. The present amendment restates the amendments to the claims introduced by the May 14, 2007 Amendment

Hence, after entry of this amendment, claims 1-12, 14-27, 29-34 and 36-46 remain pending in this application. Claims 1, 22 and 33 are independent claims. The applicant respectfully requests reconsideration of these claims, as amended, for at least the reasons presented below.

Notice of Non-Responsive Amendment

This supplemental amendment is submitted in response to the Notice, which asserted that the applicant's May 14, 2007 Amendment failed to "specifically point out how the language of the claims patentably distinguishes them from the references." While the applicant respectfully disagrees with this assertion, the Remarks/Argument below provide further detail on why the cited references fail to teach specific elements of each pending claim. Hence, it is believed that this supplemental amendment overcomes the objections in the Notice, and consideration of the amended claims and arguments herein is respectfully requested.

Interview

On March 12, 2007, the Examiner granted an interview to discuss the rejections presented by the Office. In particular, the undersigned and the Examiner discussed claims 1, 22 and 33. The undersigned appreciates the consideration shown by the Examiner in granting the interview and Examiner's courtesy during the interview. While no agreement was reached on the ultimate allowability of the claims, the Examiner conceded that there are patentable

distinctions between the pending claims and the cited references. The Examiner, however, requested amendments to more clearly set forth the relationship between an access management system, an identity profile, and a workflow. The claims have been amended herein to more clearly describe this relationship.

Claim Amendments

Claim 1 has been amended to recite "one or more parameters for defining one or more workflows for managing identity profiles, wherein said one or more parameters comprise a parameter that defines an operation to be performed on identity profiles as part of said one or more workflows." Claim 1 has also been amended to recite "creating a definition of a first workflow for managing, an identity profile for at least one user, based on said template, wherein said identity profile is used by said access management system to control access by said at least one user to said resources across one or more web servers." Support for this amendment can be found throughout the application, including, inter alia, the prior version of claim 1 and the portions of the specification supporting that claim, as well as at page 3, lines 5-6, page 8, lines 10-20, page 10, line 19 – page 11, line 18, and page 38, line 3 – page 39, line 6. Claim 1 also has been amended to indicate that the definition of a workflow is stored at a mass storage device, which is disclosed, inter alia, by Fig. 2 (reference numeral 54), and at page 15, line 31 – page 16, line 3.

Claims 22 and 33 have been amended in similar fashion to claim 1. Claim 33 also has been amended to remove element headings, so as to prevent any interpretation of claim 33 to require any ordering of the recited elements.

35 U.S.C. § 103 Rejection, Chang in view of Sakaguchi and further in view of Mein

The Final Office Action rejected claims 1-12, 14-27, 29-34 and 36-45 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,968,503 to Chang et al. (hereinafter "Chang") in view of U. S. Patent No. 6,986,138 to Sakaguchi et al. (hereinafter "Sakaguchi"). The Final Office Action also rejected claim 46 under 35 U.S.C. § 103(a) as being unpatentable

over Chang in view of Sakaguchi in further view of U. S. Patent No. 6,457,066 to Mein et al. (hereinafter "Mein").

As discussed in the interview, however, no combination of Chang, Sakaguchi and Mein teaches or suggests the elements recited by claims 1, 22 and 33, at least as amended. Merely by way of example, neither Chang, Sakaguchi nor Mein teaches or suggests either "the access management system accessing a template that indicates one or more parameters for defining one or more workflows for managing identity profiles, wherein said one or more parameters comprise one or more parameters that define an operation to be performed on identity profiles as part of said one or more workflows," or "creating a definition of a first workflow for managing an identity profile for at least one user, based on said template, wherein said identity profile is used by said access management system to control access by said at least one user to said resources across one or more web servers," both of which are recited by claim 1.

In particular, the cited references fail even to teach an access management system that comprises "an identity system for managing identity profiles and an access system for providing security of resources across one or more web servers," let alone the step of "[an] access management system accessing a template that indicates one or more parameters for defining one or more workflows for managing identity profiles," let alone that "said one or more parameters comprise one or more parameters that define an operation to be performed on identity profiles as part of said one or more workflows."

For example, Chang, rather than teaching an access management system, "relates to an XML user interface used in a workflow server," Chang, c. 1, ll. 8-9, in which "a workflow server system is provided which uses an XML namespace designed to execute various workflow server services." *Id.*, c. 1, ll. 53-55. "The workflow server may include an XML Execution Engine, which uses the XML namespace to execute commands issued by the user from a web browser." *Id.*, c. 1, l. 55-57. "The Workflow Server passes a user command to an XML Execution Engine, accesses an XML namespace to determine how to execute said command, executes said command, accessing a database if necessary, and returns an XML document back to user for display on the user's web browser, said XML document containing a reference to an XSL file." *Id.*, c. 1, ll. 61-67.

Clearly, Chang is directed not to an access management system, but instead to a "workflow server" that has nothing whatsoever to do with access management; rather, Chang's workflow server is used to track information and manage processes such as, for example, patient records and procedures in a medical practice. *See, e.g.*, Chang, c. 17, ll. 30-67. Nothing in Chang teaches or suggests that the workflow server might comprise (or be included in) an access management system comprising an identity system for managing identity profiles and an access system for providing security of resources across one or more web servers. Unsurprisingly, then, nothing in Chang even comes close to suggesting "[an] access management system accessing a template that indicates one or more parameters for defining one or more workflows for managing identity profiles," as recited by claim 1.

Sakaguchi is no more helpful. The final office action cites Fig. 12b of Sakaguchi as teaching "an access management system comprising an identity system for managing identity profiles, and an access system for providing security of resources across one or more servers." Final Office Action, at 3. A review of Fig. 12b, however, reveals neither an access management system, an identity system, nor an access system. Instead, Fig. 12b illustrates a system whereby a client (1106) contacts a virtual workflow server (1102), which is coupled to three actual workflow servers (1104) – there is no hint in either Fig. 12b or the accompanying description (c. 6, 1. 47 – c. 7, 1. 3) of any management of identity profiles or provision of security of resources across any servers, let alone web servers, as recited by claim 1.

The final office action cites c. 7, ll. 31-48 and c. 12, ll. 61-67 and Fig. 2 of Sakaguchi as teaching "an access management system accessing a template that includes parameters for defining workflows." While the passage from column 12 does mention the concept of access rights, that passage has nothing to do with accessing a template that includes parameters. Similarly, the passage in column 7 describes a "virtual workflow node table," but it appears to have nothing to do with accessing a template that includes parameters for defining workflows. Instead, that passage discusses the rights that virtual nodes have to execute or inspect existing workflows. Figure 2 provides no additional disclosure that is relevant to the element at issue. Moreover, even assuming these passages did teach "an access management system accessing a template that includes parameters for defining workflows," claim 1, as

Amdt. dated: August 20, 2007

Reply to Office Action of July 18, 2007

PATENT

amended, further recites, "wherein said one or more parameters comprise one or more parameters that define an operation to be performed on identity profiles as part of said one or more workflows," and a review of Sakaguchi reveals no disclosure that might be considered to even suggest this element. Hence, for at least this reason, claim 1 is believed to be allowable over the combination of Chang and Sakaguchi.

In addition, claim 1 recites, "wherein said identity profile is used by said access management system to control access by said at least one user to said resources across one or more web servers." Nothing in Sakaguchi or Chang even suggests the use of an identity profile to control access by a user to resources across one or more web servers, let alone creating a definition of a workflow for managing such an identity profile. For at least this additional reason, claim 1 is believed to be allowable over the combination of Chang and Sakaguchi.

Accordingly, claim 1 is believed to be allowable over the cited combination. For at least similar reasons, claims 22 and 33 are believed to be allowable as well. The remaining claims each depend from either claim 1, claim 22 or claim 33, and are believed to be allowable at least by virtue of this dependence. (The rejection of claim 46 additionally cites Mein, but Mein fails to provide the disclosure missing from Chang and Sakaguchi, as described above, so claim 46 is allowable over the combination of Chang, Sakaguchi and Mein as well.) Reconsideration of the amended claims is respectfully requested.

CONCLUSION

In view of the foregoing, the applicant believes all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

Appl. No. 09/998,910		
Amdt. dated:	August 20, 2007	
Reply to Office Action of July 18, 2007		

PATENT

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Dated: August 20, 2007 Respectfully submitted,

/Chad E. King/ Chad E. King Reg. No. 44,187

TOWNSEND and TOWNSEND and CREW LLP Two Embarcadero Center, Eighth Floor San Francisco, California 94111-3834 Tel: 303-571-4000 (Denver office) Fax: 303-571-4321 (Denver office)

CEK:jep 61128853 v1